

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: AGNES L. HAYES
DEBTOR**

**CASE NO. 17-04633 JAW
CHAPTER 13**

MOTION TO REOPEN AND REINSTATE CHAPTER 13 CASE

COMES NOW, Debtor AGNES L. HAYES, by and through counsel, and files this Motion to Reopen and Reinstate Chapter 13 Case:

1. Debtor filed this Chapter 13 Bankruptcy on December 18, 2017. Debtor's Chapter 13 case was dismissed on November 9, 2021, after confirmation of plan, due to inability to make plan payments. Debtor's case was closed on January 7, 2022.
2. Pursuant to Federal Rules of Bankruptcy Procedure 5010 and § 350(b) of the U.S. Bankruptcy Code, a closed case may be reopened to administer assets, to accord relief to the debtor, or for other cause.
3. Debtor hereby requests that this case be reopened and reinstated to administer an asset and to accord relief, as may be appropriate, to Debtor and interested parties. The Debtor has a pending personal injury claim wherein the loss date occurred during the open period of this Chapter 13 bankruptcy.

WHEREFORE, ALL PREMISES CONSIDERED, the Debtor prays that the Court will reopen and reinstate this Chapter 13 case and grant such other relief as the Court deems appropriate.

Respectfully submitted, this 18th July 2022.

Agnes L. Hayes, Debtor

BY: /s/ Louise Harrell
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CERTIFICATE OF SERVICE

I, LOUISE HARRELL, Attorney for the above listed Debtor, do hereby certify that I have this date mailed by regular mail or electronic mail a true and correct copy of the attached Motion to Reopen and Reinstate Chapter 13 Case to the Chapter 13, James L. Henley, Jr., United States Trustee, and all Creditor(s) on the Master Matrix List which is attached hereto.

THIS 18th day of July, 2022.

/s/Louise Harrell
LOUISE HARRELL